



COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

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Keegan, Werlin & Pabian, L.L.P.  
21 Custom House  
Boston, Massachusetts 02110

BY FAX AND U.S. MAIL

RE: City of Waltham, D.T.E. 02-11

March 7, 2002

Dear Sirs:

Enclosed please find the Department's first set of information requests on the above-captioned matter. Responses should be filed on or before March 19, 2002. If you have any questions, please feel free to contact me at (617) 305-3620.

Sincerely,

William H. Stevens, Jr.  
Hearing Officer

Staff as assigned  
Service list  
Encl.

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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CITY OF WALTHAM	)	D.T.E. 02-11
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FIRST SET OF INFORMATION REQUESTS OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
BOSTON EDISON COMPANY

Pursuant to G.L.c.164, ' 34A, the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison the following information requests with respect to the above captioned matter.

**Instructions**

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Boston Edison Company in this proceeding.

1. "Company" or "BEC" means Boston Edison Company, its officers, directors, employees, consultants, and attorneys.
2. "City" means the city of Waltham.
3. "Waltham Petition" means the Petition of the City of Waltham, and all attachments, filed with the Department, pursuant to G.L. c. 164, § 34A, on January 24, 2002 and docketed as D.T.E. 02-11.
4. "NSTAR Calculation" means the document entitled "NSTAR Purchase Price Calculation" filed as Attachment B to the Waltham Petition.
5. "Robinson Testimony" means the testimony of Bryant K. Robinson filed by the Company with the Department on March 1, 2002.
6. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
7. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
8. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the

## First Set of Department Information Requests

scope of these requests between the time of the original response and the close of the record in this proceeding.

9. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
10. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
11. If the Company finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
12. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) James Byrnes, Rates and Revenues Requirements Division; (2) Joseph Passaggio, Rates and Revenues Requirements Division; (5) Sean Hanley, Rates and Revenues Requirements Division.

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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FIRST SET OF INFORMATION REQUESTS OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
BOSTON EDISON COMPANY

- IR-DTE-1-1 Refer to the “NSTAR Purchase Price Calculation” (“NSTAR Calculation”), (pages 1-2 of Attachment B of the Waltham Petition). Please recalculate the selling price of the street lighting equipment using “Net Investment” (column 4 in the NSTAR Calculation) as the basis for making all necessary allocations, including CCNC. Please continue to prorate the balance for Account 636 in the same manner (i.e., 80/742 as indicated in note three of the NSTAR Calculation).
- IR-DTE-1-2 Refer to the NSTAR Calculation (pages 1-2 of Attachment B of the Waltham Petition). Please recalculate the selling price of the street lighting equipment using “Gross Plant” (column 2 of the NSTAR Calculation) as a basis for making all necessary allocations, including CCNC and accumulated depreciation. Please continue to prorate balance for Account 636 in the same manner (i.e., 80/742 as indicated in note three of the NSTAR Calculation).
- IR-DTE-1-3 Refer to paragraphs 8 and 14 of the Waltham Petition. The total of all accounts to be allocated to Account 636 is a negative value of \$29,655.29. The Company's method allocated a negative value of \$72,470.17 to Account 636, 244% of the negative value of all the accounts to be allocated. Please explain why this allocation method does not "understate the value of the commercial streetlights and overstate the value of the municipal streetlight plant" (see Waltham Petition at paragraph 14).
- IR-DTE-1-4 Refer to the Waltham Petition at paragraphs 8 and 14. Please explain how the Company's allocation method would affect the calculation of unamortized investment in street light equipment in other municipalities in the Company's service territory. Include in your response a discussion on the extent the Company's allocation method would result in cross-subsidization with respect to the recovery of BECO's plant investment in street lighting equipment in other municipalities that chose to purchase streetlight equipment from BECo.

## First Set of Department Information Requests

- IR-DTE-1-5 Refer to page 5 of the testimony of Bryant K Robinson ("Robinson Testimony"). Please explain how the Company determined the amount of accumulated depreciation booked to the individual street lighting accounts. Please provide complete and detailed documentation to support your response.
- IR-DTE-1-6 Refer to pages 7-9 of the Robinson Testimony. Please confirm whether the Company's method allocates more gross plant to Account 635 (due to greater plant investment in Account 635 versus Account 636) and more accumulated depreciation, on a relative basis, to Account 636 (due to the older vintage in Account 636 ).
- IR-DTE-1-7 Refer to page 6 of the Robinson Testimony. Please identify where and how the Company's proposed method of allocating costs and accumulated depreciation for Waltham was consistent with the method BECo used in computing its unamortized investment in street lighting equipment sold to the Towns of Lexington and Acton. Provide complete and detailed documentation to support your response.
- IR-DTE-1-8 Refer to page 6 of the Robinson Testimony. Please identify where and how the Company's proposed method of allocating costs and accumulated depreciation for Waltham was consistent with the method NSTAR used in computing its unamortized investment in street lighting equipment NSTAR sold to the Towns of Harwich, Sandwich and Edgartown. Provide complete and detailed documentation to support your response.
- IR-DTE-1-9 Refer to page 7 of the testimony of the Robinson Testimony. Please explain why "an allocation based upon net plant investment would fail to recognize the vintages of the investments made to serve the two classes of street lights in accounts 635 and 636." Provide complete and detailed documentation to support your response.
- IR-DTE-1-10 Refer to page 9 of the Robinson Testimony and the "Net Investment" method requested in IR-DTE-1-1. Indicate whether the Company ever utilized the "Net Investment" method to allocate costs in its last rate case or any true-up proceeding before this Department. If the response is affirmative, please identify the type of proceeding and explain why the "Net Investment" allocator was appropriate in that proceeding, but not here. Provide complete and detailed documentation to support your response.